

Julius Bär

PRIVACY NOTICE OF JULIUS BAER INTERNATIONAL ADVISORY (URUGUAY) S.A.

The following information is intended to provide you with an overview of how your data is processed by Julius Baer International Advisory (Uruguay) S.A. (JBIA) as the controller of the data and outlines your rights under data protection legislation. Which specific data is processed and how it is used depends upon the requested or agreed services and the steps taken prior to entering into a contract.

1 Contact details of JBIA and the Data Protection Officer

Julius Baer International Advisory (Uruguay) S.A.
Data Protection Officer
Zonamérica
Edificio M2
Ruta 8 Km 17.500
Montevideo, Uruguay
jbiauy@juliusbaer.com

2 Which data is used by Julius Baer?

JBIA processes data that it receives from you and that it generates as part of the business relationship with you. This includes personal data (including sensitive personal data), i.e. data that directly identifies you as a client (e.g. name, address, telephone number, etc.), or data that allows for identification when used in connection with other information. In addition to data that JBIA receives directly from you, it also obtains and processes data on you from publicly available sources (e.g. the Internet, [social] media, debtor directories, land registers, trade and association registers, the print media, etc.) or that JBIA receives from other Julius Baer Group companies or from authorised third parties.

JBIA processes the following personal data in particular:

- personal details (e.g. name, address and other contact data, date and place of birth, as well as nationality);
- identification data (e.g. identification documentation data);
- authentication data (e.g. specimen signature);
- data arising from the fulfilment of obligations, in particular related to services or transactions (e.g. transaction data including details of the principal and the recipient);
- advertising and sales data;
- record-keeping data (e.g. minutes of consultation);
- accounting data (e.g. contact notes), details relating to your personal background and financial situation (e.g. information on compliance and/or regulatory matters such as credit reports, origin of wealth and funds, financial knowledge and experience) and/or company-related data (e.g. business activities, purpose, ownership and organisational structure as well as number of employees);
- sensitive personal data, such as your biometric data, information regarding your religious, ideological or political views or activities and relating to your health, and convictions or sanctions under criminal law;
- data regarding related third parties such as beneficial owners, employees, relatives, authorised signatories, agents and/or representatives;
- other data comparable to the categories outlined above.

Julius Bär

3 For what purpose and on what legal basis does JBIA use your data?

a) To fulfil contractual obligations and take steps prior to entering into a contract

The processing of your data allows JBIA to provide you with the contractually agreed services and to take steps prior to entering into a contract. JBIA uses your data, among other purposes, to identify individuals, verify documents, analyse needs, provide advice, wealth management, wealth planning. Further details can be found in your contract documents.

b) To safeguard interests

JBIA will also process your data for the following purposes in order to protect its own legitimate interests or the interests of third parties:

- prevention and investigation of criminal acts;
- testing and analysis of your potential needs and optimisation of client contact;
- risk management (e.g. calculation of eligible equity capital for JBIA's) within JBIA and Julius Baer Group companies;
- assertion of legal claims and defence in legal disputes;
- supervision, consolidation and updating of the data relating to you that JBIA and Julius Baer Group companies process (single-client view);
- consultation and exchange of data by or with information agencies (e.g. debt collection re-gisters) for determination of creditworthiness or default risks in the credit business or, if required, in the case of seizure protection accounts or base accounts;
- advertising, market research or surveys;
- safeguarding JBIA's IT security and IT operations;
- outsourcing of JBIA functions and services to Julius Baer Group companies or to service providers and other agents appointed by JBIA;

- video surveillance for safeguarding access rights, collecting evidence in case of JBIA robberies, fraud prevention;
- measures to ensure the security of buildings and systems (e.g. entry controls);
- measures for business management purposes and for the development of new services and products;
- collection of personal data from publicly available sources for the purpose of market research and business development.

c) On the basis of your consent

Provided your consent has been given, JBIA is legally permitted to process personal data for specific purposes (e.g. the evaluation of transaction patterns for marketing purposes, etc.). You are able to withdraw your consent at any time.

Please note that the withdrawal of consent has no retroactive effect on the processing of your data.

d) On the basis of statutory requirements or in the public interest

JBIA's activities are subject to various regulations (e.g. CBU - Central bank of Uruguay regulations and circulars, Uruguayan Anti-Money Laundering regulations, Uruguayan data privacy regulations), and JBIA has to fulfil requirements laid down by JBIA's regulator. The processing of data is used, among other things, for the verification of identity and age, the prevention of fraud and money laundering, the fulfilment of monitoring and reporting obligations, as well as the analysis, examination, assessment and management of risks of JBIA and other Julius Baer Group companies.

4 Who can access your data?

Within JBIA and other Julius Baer Group companies, access is granted only to personnel requiring your data for the fulfilment of JBIA's contractual and legal obligations towards you (need-to-know principle).

Julius Bär

Service providers and other agents appointed by JBIA process your data for the same purpose. These include companies in the areas of IT (e.g. data hosting and processing, IT development, support and operation), wealth management services and ancillary activities, compliance and risk management functions, accounting (financial accounting and controlling), as well as other back- and middle-office activities.

If the service providers concerned need to process your data on behalf of JBIA, they are contractually required to comply with the applicable non-disclosure obligations and data protection and/or JBIA client confidentiality requirements.

Information relating to you is only forwarded by JBIA if this is stipulated in agreements you have concluded with JBIA, if there is a legal requirement, or if you have agreed to this (e.g. for a financial transaction on your behalf), or if JBIA is authorised to issue information related to the services provided. Subject to these conditions, recipients of personal data can include, amongst others:

- public bodies and institutions (e.g. the Central Bank of Uruguay, law enforcement authorities) in the event of a statutory or official obligation;
- other Julius Baer Group companies for risk management purposes as a result of legal or regulatory obligations, as well as service providers and other agents appointed by JBIA;
- other data recipients for which you have given your consent.

5 Does JBIA transfer data across borders?

JBIA transfers your data to countries outside Uruguay if

- the data is transferred to other Julius Baer Group companies;
- this is required for the execution of your orders (e.g. payment and securities orders);

- it is a statutory requirement (e.g. disclosure obligations under tax law);
- it is provided for in your agreements with JBIA or you have given your consent in another way.

These data transfers are secured through corresponding guarantees on the part of the recipients to ensure an appropriate level of data protection.

6 How long will your data be stored?

JBIA processes and retains your data only for as long as is required to fulfil its contractual and legal obligations.

If data is no longer required for the fulfilment of contractual or legal obligations, it will be deleted at regular intervals, unless it is required for further processing. This requirement could be:

- to fulfil specific regulations that require JBIA to retain data;
- to assert, exercise or defend legal claims.

7 What are your rights under data protection law?

The applicable data protection legislation grants you rights, amongst others:

- requesting that information on personal data that JBIA holds on record be shared with you;
- demanding that the information be rectified should it be incorrect;
- asking that your data be deleted if JBIA is not permitted or is not legally obliged to retain this data;
- demanding that the processing of this data be restricted if
 - you have disputed the accuracy of the data stored by JBIA and it has not yet completed its assessment,
 - you object to the deletion although JBIA is obliged to delete the data;
- demanding that your personal data which you have provided to JBIA be transferred in a generally useable, machine-readable and conventional format.

Julius Bär

You may also object to the data processing by JBIA if

- JBIA only processes the data on the basis of its legitimate interests – in this case it will cease the processing unless this is outweighed by its own interests or it needs to process the data in order to exercise its rights, or
- the processing is carried out with a view to direct advertising;

You may exercise your rights in the terms and conditions foreseen in the Uruguayan data privacy regulation by contacting JBIA in the domicile or email address stated in section 1.

You also have a right to exercise the *habeas data* procedure foreseen in the regulation in force.

8 What data are you required to supply?

JBIA requires you to provide the data necessary for the acceptance and execution of a business relationship and the fulfilment of the associated contractual and/or legal obligations. Unless it obtains this data from you, JBIA will most likely be unable to enter into a contractual relationship with you.

Under the regulations on combating money laundering and the financing of terrorism in particular, JBIA is obligated to verify your identity on the basis of your identification document and in this context to collect and store your address, nationality, name, date and place of birth as well as identification data prior to the commencement of a business relationship. In order for JBIA to comply with these regulations, you are required to supply it with the necessary information. If this information changes during the course of the business relationship, you are obliged to notify JBIA without delay. If you do not provide JBIA with the necessary information, it will not be able to commence or continue a business relationship with you.

9 Is the decision-making automated?

As a basic principle, JBIA does not use fully automated decision-making for commencing and conducting its business relationships. If JBIA does apply this procedure in exceptional cases, it will inform you accordingly where this is a statutory requirement.

10 Will your data be automatically processed?

In specific areas, JBIA will process your data on a semi-automated basis, the aim being to evaluate personal criteria (profiling), for example, in the following cases:

- In order to combat money laundering, the financing of terrorism and criminal acts, JBIA also conducts data assessments (among others in payment transactions). The aim of these measures is to protect you.
- JBIA uses assessment tools to provide you with relevant and appropriate information on its products and services. This enables it to carry out demand-based communication and advertising, including market and opinion research.

11 Where can you find JBIA's current privacy notice?

You can find the applicable version at www.juliusbaer.com/clientdataprivacypolicy#Uruguay.

JBIA reserves the right to amend this privacy notice from time to time and will inform you of such an amendment in an appropriate manner.

12 How can you contact JBIA?

Should you have any questions about the treatment of your data, please contact your relationship manager or the Data Protection Officer mentioned in section 1, who will be able to assist you.

Montevideo, September 2021